

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

EARL CRUMPE, individually and on behalf of
all others similarly situated,

PLAINTIFF,

v.

TD BANK, N.A.,

DEFENDANT.

Civil Action No. 1:25-cv-01566 (RMB) (SAK)

AMENDED DECLARATION OF
MICHAEL J. BOYLE

MICHAEL J. BOYLE, being duly sworn, declares under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following statements are true and correct to the best of his information and belief.

1. In accordance with the Text Order of Hon. Sharon A. King, U.S.M.J. dated April 8, 2025, I make this Amended Declaration in support of the motion made by Neil Grossman, a member of the bar of this Court and counsel in this action for the plaintiff, EARL CRUMPE, for an Order pursuant to Rule 101.1(c) of the Local Civil Rules of the United States District Court for the District of New Jersey granting me permission to appear and to participate *pro hac vice* as an attorney for the plaintiff in this action. I am not otherwise eligible for admission to practice before the United States District Court for the District of New Jersey.

2. I am of counsel to the firm of Bronstein, Gewirtz & Grossman, LLC, which has offices in New Jersey at 40 Calumet Avenue, Lake Hiawatha, New Jersey 07034, in New York at 60 East 42nd Street, Suite 4600, New York, New York 10165, and in Columbus, Ohio at 4200 Regent Street, Suite 200, Columbus, Ohio 43219.

3. I am and have been a member in good standing of the bar of all courts of the State of California, including the highest court of that State, since 2008. The name and address of the office maintaining the roll of the members of that bar is Attorney Services, The State Bar of California, 180 Howard Street, San Francisco, CA 94105.

4. I have been a member in good standing of the bar of all courts of the State of Ohio, including the highest court of that State, since 2014. The name and address of the office maintaining the roll of the members of that bar is Office of Attorney Services, Supreme Court of Ohio, 65 South Front Street, 5h Floor, Columbus, OH 43215-3431.

5. I have also been admitted and am eligible to practice in various federal courts, specifically, the United States District Courts for the Northern, Southern, Central and Eastern Districts of California, the Northern and Southern Districts of Ohio, the Central and Northern Districts of Illinois, the Eastern and Western Districts of Wisconsin, and the United States Courts of Appeals for the Sixth, Seventh, Ninth and Eleventh Circuits. The office or officials maintaining the rolls of members of the aforementioned courts, together with the years of my admission, are as follows:

(a) State of California (admitted 2008): Attorney Services, The State Bar of California, 180 Howard Street, San Francisco, CA 94105.

(b) United States Court of Appeals for the Ninth Circuit (admitted 2009): Attorney Admissions, The James R. Browning Courthouse, 95 7th Street, San Francisco, CA 94103.

(c) United States District Court for the Northern District of California (admitted 2009): Clerk of the Court, United States District Court, 450 Golden Gate Avenue, San Francisco, CA 94102.

(d) United States District Court for the Eastern District of California (admitted 2010):
Office of the Clerk, 501 I Street, Room 4-200, Sacramento, CA 95814.

(e) United States Court of Appeals for the Sixth Circuit (admitted 2011): 540 Potter
Stewart U.S. Courthouse, 100 E. Fifth Street, Cincinnati, OH 45202-3988.

(f) United States District Court for this Southern District of Ohio (admitted 2012):
Office of the Clerk, Joseph P. Kenneary U.S. Courthouse, Room 121, 85 Marconi Boulevard,
Columbus, OH 43215.

(g) United States District Court for the Central District of California (admitted 2013):
Attorney Admissions, United States District Court, Central District of California, 312 N. Spring
Street, Los Angeles, CA 90012.

(h) United States District Court for the Southern District of California (admitted
2013): Clerk of the Court, United States District Court, Southern District of California, 333
West Broadway, Suite 420, San Diego, CA 92101.

(i) United States District Court for the Central District of Illinois (admitted 2013):
Office of the Clerk, 309 U.S. Courthouse, 100 N.E. Monroe Street, Peoria, IL 61602.

(j) United States District Court for the Northern District of Illinois (admitted 2013):
Attorney Admissions, U.S. District Court, 219 S. Dearborn Street, Room 2050, Chicago, IL
60604.

(k) United States District Court for the Eastern District of Wisconsin (admitted
2013): Attorney Admissions, United States District Court, 517 East Wisconsin Avenue, Room
362, Milwaukee, WI 53202.

(l) State of Ohio (admitted 2014): Office of Attorney Services, Supreme Court of
Ohio, 65 South Front Street, 5th Floor, Columbus, OH 43215-3431.

(m) United States District Court for the Western District of Wisconsin (admitted 2014): U.S. District Court, Western District of Wisconsin (Attention: Admissions Clerk), 120 North Henry Street, Room 320, Madison WI 53703.

(n) United States District Court for the Northern District of Ohio (admitted 2015): Attorney Admissions, United States District Court, Northern District of Ohio, Carl B. Stokes United States Court House, 801 West Superior Avenue, Cleveland, OH 44113-1830.

(o) United States Court of Appeals for the Seventh Circuit (admitted 2015): Office of the Clerk, Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Room 2722, Chicago, IL 60604.

(p) United States Court of Appeals for the Eleventh Circuit (admitted 2016): Clerk, United States Court of Appeals, 56 Forsyth Street, N.W., Atlanta, GA 30303.

6. I have read and am familiar with the Local Rules of the United States District Court for the District of New Jersey, the New Jersey Rules of Professional Conduct, and the Federal Rules of Civil Procedure.

7. There are no grievances or other disciplinary proceedings currently pending against me in any court.

8. I have never been reprimanded, suspended, placed on inactive status, otherwise disciplined, or disbarred by any court or administrative body, and I have never resigned from the practice of law before any court. I am not on the list of lawyers disqualified to appear before this Court.

9. I do not reside in New Jersey, I am not regularly employed in New Jersey, and I am not regularly engaged in business, professional or similar activities in New Jersey.

10. Since my admission to the California bar in 2008, I have been in private practice, specializing in the field of commercial litigation, with the exception of the period from August 2011 through August 2012 when I clerked for the Honorable R. Guy Cole, Judge of the United States Court of Appeals for the Sixth Circuit.

11. I made an application to practice *pro hac vice* in this Court, which was approved, in the matter of *Pritchard v. Comenity Bank*, Case No. 2:15-cv-5994. That matter was closed on April 28, 2017.

12. I therefore respectfully request that the motion of Neil Grossman, a member of the bar of this Court, for permission for me to appear before this court and to participate *pro hac vice* as the attorney for the plaintiff be granted.

Executed on April 10, 2025

s/ Michael J. Boyle
Michael J. Boyle